

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

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In re:	)	) Chapter 11
	)	)
MERCY HOSPITAL, IOWA CITY, IOWA, <i>et al.</i> ,	)	) Case No. 23-00623 (TJC)
	)	)
Debtors.	)	) Jointly Administered
	)	)
	)	) Docket Nos. 746, 827
	)	) Hearing Scheduled: 10:30 am March 27, 2024
	)	)

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**STIPULATION RESOLVING IOWA INSURANCE DIVISIONS OBJECTION TO  
DEBTORS' MOTION FOR ENTRY OF ORDER (I) AUTHORIZING THE DEBTORS  
TO (A) ADMINISTER, SETTLE, AND WIND DOWN WORKERS' COMPENSATION  
PROGRAM, AND (B) PAY ADMINISTRATION EXPENSES FOR WORKERS'  
COMPENSATION PROGRAM, AND (II) GRANTING RELATED RELIEF**

Mercy Hospital, Iowa City, Iowa ("Mercy") and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the "Debtors"), by agreement and stipulation with the Iowa Insurance Division for the State of Iowa ("IID", referred to collectively with the Debtors as the "Parties"), files this Stipulation resolving the Debtors' *Motion for Entry of Order (I) Authorizing the Debtors to (A) Administer, Settle, and Wind Down Workers' Compensation Program, and (B) Pay Administration Expenses for Workers' Compensation Program and (II) Granting Related Relief* at Docket No. 746 (the "Motion") and the IID *Objection* at Docket No. 827.

The Debtors engaged in discussions and correspondence with the IID and State of Iowa Worker's Compensation Commissioner representatives. Following those discussions and the submission of additional information about the Debtors' workers' compensation program, the SIR Trust, and outstanding claims, the Parties were able to reach a resolution of the issues presented. The resolution included the inclusion of reservation of rights language in the proposed Order on the Motion. Such language is included in the attached consent Order being presented to the Court.

**WHEREFORE**, the Debtors respectfully request that the Court enter the Proposed Consent Order granting the Motion in the form attached hereto as Exhibit A, and granting any such other and further relief the Court deems just and proper.

Dated: Des Moines, Iowa  
March 26, 2024

**NYEMASTER GOODE, P.C.**

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- and -

*/s/ Kristina M. Stanger*

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*Counsel for Debtors and Debtors-in-Possession*

**CERTIFICATE OF SERVICE**

The undersigned certifies, under penalty of perjury, that on this March 26, 2024, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of the Chapter 11 Cases.

/s/ Kristina M. Stanger